

Grant B. Gelberg (SBN 229454)
Grant.Gelberg@halpernmay.com
Kevin H. Scott (SBN 274605)
Kevin.Scott@halpernmay.com
Alyssa L. Titche (SBN 313296)
Alyssa.Titche@halpernmay.com
Catherine Thompson (SBN 313391)
Catherine.Thompson@halpernmay.com
HALPERN MAY YBARRA & GELBERG LLP
550 South Hope Street, Suite 2330
Los Angeles, California 90071
Telephone: (213) 402-1900

Attorneys for Defendant
MISOOK KIM

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., et al.,

Defendants.

CASE NO. 2:22-cv-09094-GW-MAR

**DECLARATION OF ALYSSA L.
TITCHE IN SUPPORT OF JOINT
OPPOSITION TO MOTION TO
ENFORCE COMPLIANCE WITH
THE COURT'S ORDERS, AND FOR
MONETARY SANCTIONS FOR
CONTEMPT**

The Honorable Margo A. Rocconi

Hearing Date: May 10, 2023

Time: 11:00 a.m.

Courtroom: 790

DECLARATION OF ALYSSA L. TITCHE

I, Alyssa L. Titche, hereby declare:

1. I am an attorney at the law firm Halpern May Ybarra Gelberg LLP, counsel for Defendant Misook Kim (“Ms. Kim”) in this action. I have sufficient personal knowledge of the facts set forth herein that if called as a witness I could and would testify competently to those facts under oath. I submit this declaration in support of Defendant’s Joint Opposition to Plaintiff Moog, Inc.’s Motion to Enforce Compliance with the Court’s Orders, and for Monetary Sanctions for Contempt.

2. I participated in a meet and confer on March 21, 2023 to discuss the pending discovery dispute which Moog planned to raise with Judge Rocconi in an informal discovery conference if the matter was not resolved to their satisfaction. During the conference, counsel for Mr. Pilkington, Rachel Fiset, notified Moog that Individual Defendants intended to assert their Fifth Amendment privilege as a basis for withholding production. In response, Moog’s counsel contended that Individual Defendants’ position violated several court orders and threatened to seek sanctions. However, Moog never discussed seeking a civil contempt finding, or even used the word “contempt” to my recollection. The parties did not discuss the legal authority for, or defenses against, civil contempt. Nor did the parties discuss any alleged violations of the TRO or Inspection Protocol.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Los Angeles, California, on April 17, 2023.

Alyssa L. Titche
ALYSSA L. TITCHE